## HEARING DATE AND TIME: April 8, 2015 at 10:00 a.m. (Eastern Time) OBJECTION DEADLINE: March 30, 2014 at 4:00 p.m. (Eastern Time)

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Attorneys for the FIG Entities (as defined below)

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11 Case No. :

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP) :

Debtors. : (Jointly Administered)

# JOINDER OF THE FIG ENTITIES TO THE OBJECTION OF CITADEL ENERGY INVESTMENTS LTD. AND CITADEL EQUITY FUND LTD. TO THE MOTION TO ALLOW DISCLOSURE OF THE DERIVATIVE QUESTIONNAIRES PURSUANT TO SECTION 107(a) OF THE BANKRUPTCY CODE

The entities listed on Exhibit A hereto (the "FIG Entities"), by and through their undersigned counsel, hereby joins in the objections of Citadel Energy Investments Ltd. and Citadel Equity Fund Ltd. (the "Citadel Objection to the Motion") filed to the Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code (the "Motion"), as follows:

#### **OBJECTION AND JOINDER**

The FIG Entities and the Debtors were parties to certain derivative contracts.

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1. The FIG Entities hereby join and incorporate by reference the arguments, in their entirety, made by Citadel Energy Investments Ltd. and Citadel Equity Master Fund Ltd. in the Citadel Objection to the Motion [Docket 49030].

WHEREFORE, for the foregoing reasons, the FIG Entities respectfully request that this Court deny the Debtors' Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code, and, alternatively, if the Court grants the Motion, direct Debtors to redact all identifying, confidential and proprietary information from any documents disclosed, including any negotiated agreement such as any ISDA Master Agreements and any Guarantees, and grant such other, further or different relief as this Court deems just and proper.

Dated: New York, New York March 30, 2015

SCHLAM STONE & DOLAN LLP

By: <u>s/ Bennette D. Kramer</u>

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Attorneys for the FIG Entities

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### Exhibit A

Drawbridge Global Macro Master Commodities Ltd

Drawbridge Global Macro Master Fund Ltd

Drawbridge Long Dated Value Fund LP

Drawbridge Long Dated Value Fund (B) LP

FCI Holdings I Ltd

FCOF Securities Ltd

Fortress Investment Fund III (Coinvestment Fund A) L.P.

Fortress Investment Fund III (Coinvestment Fund B) L.P.

Fortress Investment Fund III (Coinvestment Fund C) L.P.

Fortress Investment Fund III (Coinvestment Fund D) L.P.

Fortress Investment Fund V (Fund A) L.P.

Fortress Investment Fund V (Coinvestment Fund A) L.P.

Fortress Mortgage Opportunities Master Fund Series 2 L.P.

Fortress Value Recovery Fund I Ltd (f/k/a DB Zwirn Special Opportunities Fund, LTD)

LDVF1 FIP SARL

LDVF1 Main FIP SARL

HCM/Z Special Opportunities LLC